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Robert I. Steiner

Attorneys for Creditor  
WACHOVIA BANK, NATIONAL ASSOCIATION

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	:	
	:	
Delphi Corporation,	:	
	:	
Debtor.	:	
<hr/>		
Wachovia Bank, National Association,	:	1:07-cv-05656-SAS
	:	
Appellant,	:	<b><u>NOTICE OF MOTION</u></b>
	:	
v.	:	
	:	
Delphi Corporation, <i>et al.</i> ,	:	
	:	
Appellees.	:	

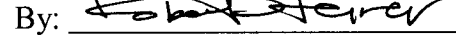
**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Robert I. Steiner, the exhibits thereto, Appellant Wachovia Bank, National Association by its attorneys Kelley Drye & Warren LLP, will move this Court before the Honorable Shira A. Scheindlin, District Judge, at the United States Courthouse, Southern District of New York, Courtroom 15C, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for a Consent Order Staying Appeal and Tolling All Briefing Deadlines.

WHEREFORE, Appellant respectfully requests that the instant Motion be granted in its entirety.

Dated: New York, New York  
June 25, 2007

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By: 

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